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UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In re:

Chapter 7 BKY 18-50378-WJF

ERP Iron Ore, LLC,

Debtor.

APPLICATION FOR APPROVAL OF COUNSEL: RECOMMENDATION AND ORDER

- 1. Applicant is the chapter 7 trustee in this case.
- 2. Applicant believes that the employment of counsel is necessary to represent or assist the trustee in carrying out the trustee's duties as follows: assisting in discovery and the trial of adversary proceedings.
- 3. Warner Law, LLC is qualified by reason of practice and experience to render such representation or assistance.
- 4. Warner Law, LLC has agreed to perform services as counsel on an hourly fee plus costs basis. Fees and costs shall be subject to court review and approval. The employment shall be effective as of September 26, 2019.
- 5. Warner Law, LLC will calculate its fees for professional services in accordance with agreed upon hourly rates for these services, as such rates are subject to adjustment from time to time, for inflation and other factors. The current compensation range for attorneys working on these matters is \$350.00 and \$160.00 for paralegal assistance. Warner Law, LLC adjusts its rates periodically, generally on January 1 of each year.
- 6. In connection with the reimbursement of actual, necessary expenses, Warner Law, LLC has advised the trustee that it charges expenses, including long-distance telephone, facsimile

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charges, U.S. Mail and overnight mail charges, photocopying charges, computerized research, transcription costs, travel and lodging costs and court filing fees.

7. To the best of the trustee's knowledge, information and belief, Warner Law, LLC has disclosed to the undersigned that it does not represent any creditors in connection with the chapter 7 cases, and is disinterested within the meaning of 11 U.S.C. §§ 327(a), 328 and Bankr. R. 2014.

WHEREFORE, applicant prays that the court approve such employment by the trustee.

Dated: September 27, 2019.

/e/ Nauni J. Manty
Nauni J. Manty, Trustee
401 Second Avenue North, Suite 400
Minneapolis, MN 55401

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UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In re:

Chapter 7 BKY 18-50378-WJF

ERP Iron Ore, LLC,

Debtor.

VERIFIED STATEMENT PURSUANT TO FEDERAL RULE 2014(a)

- I, George E. Warner, Jr., of Warner Law, LLC, P.A., the professional named in the application for employment on behalf of the above-named bankruptcy estates, declare under penalty of perjury the following:
- 1. Warner Law, LLC does not hold or represent any interest adverse to the estates and is disinterested as required by 11 U.S.C. §327 and hereby declares that it has no connections with the debtors, creditors, parties in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee. Warner Law, LLC will continue to review the docket in this case and provide the court will additional disclosures, if necessary.
- 2. Warner Law, LLC does not have any connections to the debtors, creditors, any other party in interest, the respective attorneys and accountants, the United States Trustee, or any person employed in the offices of the United States Trustee.
 - 3. Warner Law, LLC will continue to monitor and assess all of its client relationships to

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WARNER LAW, LLC

Dated: September 27, 2019

George F. Warner, Jr. (#0222719) 120 South Sixth Street, Suite 1515 Minneapolis, Minnesota 55402-1817

Telephone (952) 922-7700

UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In re:	Chapter 7 BKY 18-50378-WJF
ERP Iron Ore, LLC,	
Debtor.	
ORDER	
The trustee's application to appro	ve her employment of Warner Law, LLC, as her attorneys
came before the court. Based on the appli	ication, the recommendation of the United States Trustee,
and 11 United States Code §327,	
IT IS ORDERED: The employm	nent is approved.
Dated:	
	William J. Fisher
	United States Bankruptcy Judge